

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; Eliza
Saunders, Director of the Office of Public
Records, in her personal and official
capacity; Alison Swenson, Compliance
Analyst, in her personal capacity; Perry
Tapper, Public Records Compliance
Officer, in his personal capacity; Andrew
Palmer, Compliance Analyst, in his
personal capacity; John or Jane Does 1-12,
in his or her personal capacity,

Defendant.

No. 2:17-cv-00642-MJP

PLAINTIFF'S MOTION TO EXTEND
DISCOVERY DEADLINES

Note on Motion Calendar January 18, 2019

Ms. Dalessio requests this Court to extend the discovery deadlines in this lawsuit.

I. Argument

1. Good cause exists to extend the discovery deadline

Plaintiff has only recently received the court ordered initial disclosures from Defendants on December 21, 2018. There has not been enough time for Plaintiff to act upon the court ordered initial disclosures.

The deadline for filing all motions related to discovery is January 07, 2019. Dkt. 129. The deadline for discovery to be completed on February 07, 2019. Dkt. 129. Defendants submitted the court ordered initial disclosures on December 21, 2018. There is an outstanding motion to compel Plaintiff's first set of discovery requests that has yet to be ruled upon by this Court. Dkt. 136. There is an outstanding motion for a protective order from Plaintiff's first and second set of discovery requests that has yet to be ruled upon by this Court. Dkt. 138. And there is also Defendants' pending motion for summary judgment. Dkt. 119.

"Defendants are simply attempting to have their dispositive motion heard and are completely willing to respond to any discovery requests the Court believes are necessary for Plaintiff to respond to the almost purely legal arguments set for in Defendants' Motion for Summary Judgment." Dkt. 143-1 at 4.

For the sake of judicial economy and to avoid any unnecessary motion practice, it is necessary for this Court to extend the discovery deadlines to allow time for this Court to rule on the pending discovery motions, summary judgment motion, and to permit Plaintiff an opportunity to perform discovery on the court ordered initial disclosures. Since Defendants stated multiples in legal filings to this Court that they would respond to discovery requests at summary judgment, then Defendants will need additional time to produce the outstanding discovery.

Respectfully submitted this 07 day of January 2019.

Law Office of Joseph Thomas

/s/ Joseph Thomas
Joseph Thomas, WSBA 49532

Certificate of Service

I hereby certify that on 07 of January 2019, I filed the foregoing with the Clerk of the Court through the CM/ECF system which will automatically send electronic mail notification of such filing to the CM/ECF registered participants as identified on the Electronic Email Notice List.

/s/ Joseph Thomas
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